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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA - SOUTHERN DIVISION**

IN RE: TOYOTA MOTOR CORP.  
UNINTENDED ACCELERATION  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

This Document Relates To:

ALL CASES

Case No. 8:10ML2151 JVS (FMOx)

**Discovery Matter – Special Masters**

**SUPPLEMENTAL DECLARATION  
OF MARK P. ROBINSON, JR.**

Date: March 2, 2012  
Time: 10:00 a.m.  
Location: JAMS – Orange County

**SUPPLEMENTAL DECLARATION OF MARK P. ROBINSON, JR.**

I, Mark P. Robinson Jr., declare and state as follows:

1. I am an attorney duly licensed to practice before the Courts of the State of California and this Court, and am a partner of the firm of Robinson Calcagnie Robinson Shapiro Davis, Inc. and Co-Lead Counsel for the Personal Injury/Wrongful Death Plaintiffs. The facts contained herein are within my personal knowledge, and if called upon as a witness I could and would competently testify to the following.

2. Toyota's Privilege Log identifies Mitchiteru Kato as "Toyota Management." The excerpt below a true and correct entry from Toyota's Privilege Log:

|  |          |  |  |   |                                      |   |        |
|--|----------|--|--|---|--------------------------------------|---|--------|
| TOY-MDLID-P-00000315<br>TOY-MDLID-P-00000318 | 20061027 | LEONARD ST AMAND<br>(TOYOTA FIELD TECHNICAL<br>SPECIALIST) | TOYOTA MOTOR SALES, USA<br>LEGAL DEPARTMENT; KIRK<br>FORSHT (TOYOTA<br>MANAGEMENT) | GEORGE MORINO (TOYOTA<br>MANAGEMENT);<br>CHRISTOPHER SANTUCCI<br>(TOYOTA MANAGEMENT);<br>DAVID ZELLARS (TOYOTA<br>MANAGEMENT); DAVID<br>STOVALL (TOYOTA<br>MANAGEMENT); KAORU<br>YAMAMOTO (TOYOTA<br>MANAGEMENT); MITCHITERU<br>KATO (TOYOTA<br>MANAGEMENT) | CONFIDENTIAL<br>LITIGATION<br>REPORT | CONFIDENTIAL COMMUNICATION BEARING THE<br>LEGEND, "PRIVILEGED AND CONFIDENTIAL,"<br>PREPARED AT THE REQUEST OF COUNSEL AND<br>IN ANTICIPATION OF LITIGATION CONTAINING<br>INFORMATION PROVIDED TO COUNSEL TO<br>FACILITATE THE RENDERITION OF LEGAL ADVICE<br>REGARDING CUSTOMER CLAIM #2006-12-41406<br>CONCERNING ALLEGED UNINTENDED<br>ACCELERATION OF 2007 LEXUS ES350. | AC; WP |
|--|----------|--|--|---|--------------------------------------|---|--------|

3. Attached hereto as Exhibit 53 is a true and correct copy of a document produced by Toyota in discovery which is bates labeled TOY-MDLID01336090. This is a document from Chris Tinto and Chris Santucci to Mr. Kato and others referring to NHTSA's limiting the scope of their unintended acceleration investigation by eliminating "classic sudden acceleration" or "runaway vehicles that cannot be controlled by brakes, even though NHTSA was "investigating the Camry electronic throttle control." *Id.*

I declare under penalty of perjury in accordance with the laws of the United States of America and State of California that the foregoing is true and correct and that this declaration was executed on February 21, 2012, at Newport Beach, California.

/s/Mark P. Robinson, Jr.

Mark P. Robinson Jr.